

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HERIBERTO COLON-TORRES,  
*Plaintiff,*

v.

OCTAVIO SERRANO, ZEISLOFT TRUCKING,  
LLC d/b/a ZEISLOFT LOGISTICS a/k/a  
ZEISLOFT TRUCKING OF WEST DEPFORD  
a/k/a CHARLES D. ZEISLOFT TRUCKING,  
ZEISLOFT VENTURES, ROCK PRODUCTS,  
INC., SAINT NICK LOGISTICS, LLC., DAT  
SOLUTIONS, LLC, JOHN DOE, and ABC  
COMPANY,

*Defendants.*

Case No. 5:24-CV-01745

**STIPULATION TO DISMISS LESS THAN ALL DEFENDANTS  
AND TO AMEND CAPTION**

The parties to this action, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), through their undersigned counsel, hereby STIPULATE and AGREE that:

1. All claims in this matter against Defendants, Saint Nick Logistics, LLC and DAT Solutions, LLC, are hereby voluntarily discontinued and withdrawn, and Saint Nick Logistics, LLC and DAT Solutions, LLC are hereby dismissed from the above-captioned case.
2. It is further agreed that all claims in this matter against Defendants, Saint Nick Logistics, LLC and DAT Solutions, LLC, were brought and maintained in good faith.
3. It is further agreed that no claims for abuse of process or wrongful use of civil proceedings under the Dragonetti Act (42 Pa.C.S. §§ 8351-8354) shall be made by Defendants, Saint Nick Logistics, LLC and DAT Solutions, LLC, against Plaintiff, Plaintiff's counsel, or Plaintiff's counsel's law firms in connection with Defendants, Saint Nick Logistics, LLC and DAT Solutions, LLC, being named as parties to this action.

4. It is further agreed that Plaintiff will file an amended complaint in which the caption of this case and the body of the amended complaint omits references to Saint Nick Logistics, LLC and DAT Solutions, LLC.

5. Counsel have been duly authorized by their respective clients to enter into this Stipulation.

**JONATHAN M. COHEN, L.L.C.**

By: /s/ Steven J. Carroll  
Steven J. Carroll, Esq.  
Jonathan M. Cohen, Esq.  
Attorneys for Plaintiff

**SWARTZ CAMPBELL, LLC**

By: [Signature] 03/27/25  
William F. Conway, Esq.  
Attorneys for Zeisloft Defendants  
Rock Products Inc

**RAWLE & HENDERSON, LLP**

By: /s/ Adam C. Lazarow  
Adam C. Lazarow, Esq.  
Attorneys for Defendant Saint Nick Logistics LLC

**CONNELL FOLEY, LLP  
SQUIRE PATTON BOGGS, LLP**

By: Kristen L. Bryan  
Kristin L. Bryan, Esq.  
Patrick J. Hughes, Esq.  
Attorneys for Defendant DAT Solutions, LLC

Dated: March 27, 2025